

1 PAUL T. TRIMMER  
State Bar No. 9291  
2 [Paul.trimmer@jacksonlewis.com](mailto:Paul.trimmer@jacksonlewis.com)  
**JACKSON LEWIS P.C.**  
3 300 S. Fourth Street, Suite 900  
Las Vegas, Nevada 89101  
4 Tel: (702) 921-2460  
Fax: (702) 921-2461

5 HOWARD SHAPIRO (*pro hac forthcoming*)  
6 [Howard.Shapiro@jacksonlewis.com](mailto:Howard.Shapiro@jacksonlewis.com)  
RENE E. THORNE (*pro hac forthcoming*)  
7 [Rene.Thorne@jacksonlewis.com](mailto:Rene.Thorne@jacksonlewis.com)  
**JACKSON LEWIS P.C.**  
8 650 Poydras Street, Ste. 1900  
New Orleans, LA 70130  
9 Tel: (504) 208-1755

10 JUAN C. OBREGON (*pro hac forthcoming*)  
11 [Juan.Obregon@jacksonlewis.com](mailto:Juan.Obregon@jacksonlewis.com)  
**JACKSON LEWIS P.C.**  
12 950 17th Street, Ste. 2600  
Denver, CO 802202  
Tel: (303) 892-0404

13 *Attorneys for Defendants*

14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 EBONI D. LUCAS, JEREMY GOARD,  
17 CHRISTOPHER MANLONGAT and  
18 SHAWNDREA STAFFORD, individually  
and on behalf of all others similarly  
situated,

19 Plaintiffs,

20 v.

21 MGM RESORTS INTERNATIONAL,  
22 THE INTERNAL COMPENSATION  
COMMITTEE OF MGM RESORTS  
23 INTERNATIONAL, THE  
ADMINISTRATIVE COMMITTEE OF  
24 MGM RESORTS INTERNATIONAL, and  
JOHN DOES 1-30

25 Defendants.

**CIVIL ACTION NO. 2:20-cv-01750-JAD-NJK**

**STIPULATED BRIEFING SCHEDULE AND  
SCHEDULING ORDER SUBMITTED FOR  
DEFENDANTS' MOTION TO DISMISS**

**SPECIAL REVIEW REQUESTED**

ECF No. 16

26 Defendants MGM Resorts International, The Internal Compensation Committee of MGM  
27 Resorts International, the Administrative Committee of MGM Resorts International, and John  
28 Does 1-30 ("Defendants"), and Plaintiffs, Eboni D. Lucas, Jeremy Goard, Christopher Manlongat

and Shawndrea Stafford, individually and on behalf of all others similarly situated ("Plaintiffs"), by and through their respective counsel, submit the following proposed briefing schedule in connection with Defendants' Motion to Dismiss for the Court's review and approval.

On December 14, 2020, Plaintiffs provided Defendants with waivers of service of the Amended Complaint, making Defendants' Motion to Dismiss in this class action matter due on February 12, 2021. Given the complexity of the case, the parties agreed to an extension of that deadline by three weeks, and request that the Court order the following briefing schedule:

#### **PROPOSED SCHEDULE**

1. March 5, 2021 – Defendant's Motion to Dismiss;
2. April 5, 2021 – Plaintiffs' Opposition;
3. April 26, 2021 – Defendants' Reply Brief in Support of Motion to Dismiss.
4. Because the outcome of the Motion to Dismiss will have a substantial impact on the scope, time and expense of discovery, the Parties request that further proceedings, including submission of the LR 26-1 Scheduling Order and discovery, be held in abeyance until the Court has ruled on the Motion to Dismiss.

Dated: December 29, 2020.

/s/ Paul T. Trimmer


Paul T. Trimmer (NV Bar #9291)  
**JACKSON LEWIS P.C.**  
 300 S. Fourth Street, Suite 900  
 Las Vegas, NV 89101

/s/ Mark K. Gyandoh

Mark K. Gyandoh  
**CAPOZZI ADLER, P.C.**  
 312 Old Lancaster Road  
 Merion Station, PA 19066

#### **ORDER**

Based on the parties' stipulation [ECF No. 16] and good cause appearing, the Court adopts this proposed briefing schedule for the forthcoming motion to dismiss. However, **to obtain a stay of discovery or discovery-related obligations and deadlines, the parties must file a proper joint motion to stay** with a memorandum of points and authorities. *See Tradebay, LLC v. eBay, Inc.*, 278 F.R.D. 597, 601 (D. Nev. 2011) ("It is well-established that a party seeking a stay of discovery carries the heavy burden of making a strong showing why discovery should be denied."); *see also* Local Rule IC 2-2(b) ("For each type of relief requested or purpose of the document, a separate document must be filed and a separate event must be selected for that document"); Local Rule 7-2(a) ("The motion must be supported by a memorandum of points and authorities").

  
 U.S. District Judge Jennifer A. Dorsey  
 Dated: December 29, 2020